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To Deena Vann/DC/USEPA/US@EPA
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Subject Fw: Environmental Defense comments on the Higher Alkenyl
Succinic Anhydride Category

----- Forwarded by JanetR Pope/DC/USEPA/US on 08/21/2006 09:15 AM -----



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08/17/2006 04:56 PM

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Subject Environmental Defense comments on the Higher Alkenyl
Succinic Anhydride Category

(Submitted via Internet 8/17/06 to oppt.ncic@epa.gov, hpv.chemrtk@epa.gov,
boswell.karen@epa.gov, chem.rtk@epa.gov, MTC@mchsi.com, and
len_sweet@albemarle.com)

Environmental Defense appreciates this opportunity to submit comments on the robust
summary/test plan for the **Higher Alkenyl Succinic Anhydride Category**.

The Albemarle Corporation, in response to EPA's High Production Volume (HPV) Chemical Challenge, submitted a test plan and robust summaries for a group of three alkenyl succinic anhydride chemicals plus a mixture of these chemicals. The subject chemicals are: 2,5-furandione-3-(hexyldecenyl)dihydro-, CAS# 32072-96-1; 2,5-furandione-3-(octadecenyl)dihydro-, CAS# 28777-98-2; and 2,5-furandione-3-(eicosenyl)dihydro-, CAS# 53520-67-5, referred to as C16 ASA, C18 ASA and C20 ASA respectively. They are based on the same chemical skeleton and have similar uses. Hence we support their consideration as a category. We also consider it appropriate that this submission is supported by information and/or testing described in the submission by the American Chemistry Council Petroleum Additives Panel's Health and Environmental and Regulatory Task Group (HERTG) for structurally similar chemicals. That submission, for the "Alkenyl Succinic Anhydride Category," was made in 2002 and reviewed in 2003. It indicated that limited data were available to support the required SIDS elements for those chemicals, but appropriate additional studies were proposed to address the data gaps. Chemicals in the present category are sufficiently similar to those chemicals previously considered that data developed in those studies should be sufficient to address data gaps for this category as well.

Members of this chemical category have a number of uses, but are used primarily as sizing agents in paper that in turn has consumer uses. Thus, there is considerable potential for consumer and environmental exposure. When released into the environment, they degrade slowly; however, information described in this somewhat wordy, but very thorough, test plan and robust summaries indicate these chemicals are unlikely to pose significant hazard to human health or the environment. Though some of the studies described in this submission are old and were not conducted under GLP guidelines, they appear adequate to address the respective SIDS elements. Testing is limited to that proposed in the previous submission by the HERTG, to be conducted on a mixture of C16 ASA and C18 ASA. We agree that the proposal is sufficient and that data derived from these studies can be appropriately bridged to address required SIDS elements for members of this chemical category.

In summary, we consider it appropriate that this submission draws significantly on the previous submission and on data generated by the testing proposed for the "Alkenyl Succinic Anhydride Category."

Thank you for this opportunity to comment.

Hazel B. Matthews, Ph.D.
Consulting Toxicologist, Environmental Defense

Richard Denison, Ph.D.
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(Note: There is an error in EPA's name for this submission on its website (see www.epa.gov/chemrtk/pubs/summaries/hialksan/c16228tc.htm): The name of this submission is erroneously given as "Ring Substituted Anilines Category" rather than "Higher Alkenyl Succinic Anhydrides". The former is actually the name for a different submission, also by Albemarle, online at www.epa.gov/chemrtk/pubs/summaries/ringsact/c16251tc.htm.)